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11

**UNITED STATES DISTRICT COURT**  
 12          **NORTHERN DISTRICT OF CALIFORNIA**

13          STANFORD HOSPITAL & CLINICS and  
 14          LUCILE PACKARD CHILDREN'S  
 15          HOSPITAL,

16           Petitioners,

17           vs.

18          SERVICE EMPLOYEES  
 19          INTERNATIONAL UNION, LOCAL 715,

20           Respondent.

21          Case No: 5:07-CV-05158-JF

22          [PROPOSED] ORDER GRANTING  
 23          STANFORD HOSPITAL AND  
 24          CLINICS AND LUCILE PACKARD  
 25          CHILDREN'S HOSPITALS' MOTION  
 26          TO COMPEL RESPONSES TO  
 27          DISCOVERY SUBPOENA  
 28          PROPOUNDED TO UHW

29          Date: August 27, 2008

30          Time: 9:30 A.M.

31          Dept: Courtroom 4, 5th Floor

32          Judge: Hon. Jeremy Fogel  
 33          Magis. Judge: Hon. Richard Seeborg

34          SERVICE EMPLOYEES  
 35          INTERNATIONAL UNION, LOCAL 715

36           Petitioner and Counter-  
 37           Respondent,

38           vs.

39          STANFORD HOSPITAL & CLINICS and  
 40          LUCILE PACKARD CHILDREN'S  
 41          HOSPITAL

42           Respondents and Counter-  
 43           Petitioners.

44          Case No: 5:08-CV-00213-JF

45          Judge: Hon. Jeremy Fogel

46          [PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD  
 47          CHILDREN'S HOSPITALS' MOTION TO COMPEL RESPONSES TO DISCOVERY SUBPOENA  
 48          PROPOUNDED TO UHW

49          CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;  
 50          5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

1 SERVICE EMPLOYEES  
2 INTERNATIONAL UNION, LOCAL 715

Case No: 5:08-CV-00215-JF

3 Petitioner,

4 vs.

5 STANFORD HOSPITAL & CLINICS and  
6 LUCILE PACKARD CHILDREN'S  
7 HOSPITAL

Judge: Hon. Jeremy Fogel

8 Respondents.

9 SERVICE EMPLOYEES  
10 INTERNATIONAL UNION, LOCAL 715

Case No: 5:08-CV-00216-JF

11 Petitioner,

12 vs.

13 STANFORD HOSPITAL & CLINICS and  
14 LUCILE PACKARD CHILDREN'S  
15 HOSPITAL

Judge: Hon. Jeremy Fogel

16 Respondents.

17 SERVICE EMPLOYEES  
18 INTERNATIONAL UNION, LOCAL 715

Case No: 5:08-CV-01726-JF

19 Petitioner,

20 vs.

21 STANFORD HOSPITAL & CLINICS and  
22 LUCILE PACKARD CHILDREN'S  
23 HOSPITAL

Judge: Hon. Jeremy Fogel

24 Respondents.

25 SERVICE EMPLOYEES  
26 INTERNATIONAL UNION, LOCAL 715

Case No: 5:08-CV-01727-JF

27 Petitioner,

28 vs.

29 STANFORD HOSPITAL & CLINICS and  
30 LUCILE PACKARD CHILDREN'S  
31 HOSPITAL

Judge: Hon. Jeremy Fogel

32 [PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD  
33 CHILDREN'S HOSPITALS' MOTION TO COMPEL RESPONSES TO DISCOVERY SUBPOENA  
34 PROPOUNDED TO UHW

CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;  
5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

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2       The Motion to Compel Responses To Discovery Subpoena Propounded To UHW  
3 (the “Motion”) brought by Stanford Hospital And Clinics and Lucile Packard Children’s  
4 Hospital (the “Hospitals”), in the above-referenced related cases came on for hearing  
5 before the above-captioned Court, the Honorable Richard Seeborg presiding, on  
6 \_\_\_\_\_, 2008.

7       The Court, having considered the pleadings in this matter, and all papers submitted  
8 in support of, and in opposition to, said motion, and having heard the argument of  
9 counsel, and good cause appearing therefor, hereby **GRANTS** the Motion in its entirety.

10      Service Employees International Union, United Healthcare Workers - West  
11 (“UHW”) shall provide full and complete responses to the subpoenas propounded upon it  
12 by the Hospitals in the above-referenced cases. UHW’s responses shall include  
13 electronically stored information that is responsive to the subpoenas, including website-  
14 related information. Any withholding of responsive information on the basis of a  
15 privilege or work product protection shall be supported by a privilege log that identifies  
16 the documents withheld on a document by document basis, including the following  
17 information:

- 18       1) the Bates number of the document;
- 19       2) the date of the document;
- 20       3) the specific individual author/s of the document;
- 21       4) the specific individual recipient/s of the document;
- 22       5) a precise document description;
- 23       6) the specific privilege/s claimed; and
- 24       7) the present location of the document.

25      UHW shall not withhold responsive information not subject to a privilege or work  
26 product protection.

27      UHW is ordered to serve responsive documents on or before the tenth business

1 day following the date of this order.

2 It is further ordered that UHW shall pay the Hospitals' reasonable expenses  
3 incurred in making this motion, including attorneys fees, in the amount of  
4 \$\_\_\_\_\_.

5 IT IS SO ORDERED.

6 Dated:  
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HON. RICHARD SEEBORG  
MAGISTRATE JUDGE OF THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
CALIFORNIA, SAN JOSE DIVISION

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